

**THE STATE OF NEW HAMPSHIRE**

United States District Court – District of NH

John Doe  v  Franklin Pierce University	Civil Action No. 1:22-cv-00188
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**ASSENTED-TO MOTION TO EXTEND DEADLINES FOR  
AMENDMENT OF PLEADINGS**

Plaintiff John Doe (“Doe”), by and through counsel, hereby moves this court to grant an extension of the deadlines for the parties to file motions to amend pleadings. By agreement as reflected in the discovery plan approved by this Court (Doc. #15), the current deadlines are January 1, 2023 for plaintiff, and February 1, 2023 for defendant. The Court, however, has not yet ruled on a pending motion to dismiss that covers some of the claims for liability in the Complaint, and the defense has not yet filed an Answer. Accordingly, it is appropriate to extend the deadlines by 30 days. Mr. Doe asks that the plaintiff’s deadline be extended to January 31, 2023, and the defendant’s deadline be extended to March 2, 2023.

On behalf of the defendant, Attorney Bill Wahrer has no objection to this motion.

Respectfully Submitted,

*/s Theodore M. Lothstein*

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Theodore M. Lothstein  
N.H. Bar No. 10562

CERTIFICATION

I, Theodore Lothstein, hereby certify that a copy of this motion will be sent to all registered subscribers to this case on ECF including counsel for the defendant.

*/s Theodore M. Lothstein*

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Theodore M. Lothstein